

Judge Wiles
Chapter
11

Case No. 22-10943 (MEW) (Jointly Administered)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: VOYAGER DIGITAL HOLDINGS, INC. et al.,1

Debtors.

**MOTION OF FRAUD AND DECEPTIVE PRACTICES BY COUNSEL AND
VOYAGERR DIGITAL HOLDINGS, INC. et al.,1**

Dear Honorable Judge,

It has come to my attention that VOYAGER DIGITAL HOLDINGS INC. et., al., 1, has minted fake coins and used them to pay for expenses. Furthermore, they have falsely provided financial insights and committed fraud, which has resulted in significant financial loss to their creditors. Such actions are unacceptable and must be addressed with the utmost seriousness.

Voyager has been using VGX token as a security to fund their marketing operations. VOYAGER DIGITAL HOLDINGS, INC. et al.,1 minted 40 million worth of VGX and used this to pay for expenses on the balance sheets. You can go through the accounts and see that 80% are initially zero and the remaining 20% were not daily users.

The company is in clear violation of the United States Bankruptcy Code. Specifically, the production and distribution of counterfeit coins. It violates 11 U.S.C. § 727(a)(3), which prohibits a debtor from failing to keep or preserve records, and 11 U.S.C. § 727(a)(4), which prohibits a debtor from making false oaths or accounts. Additionally, their fraudulent activities violate 11 U.S.C. § 548, which allows a trustee to avoid any transfer made or obligation incurred by a debtor within two years of the bankruptcy filing date if the transfer was made or obligation was incurred with actual intent to hinder, delay, or defraud any entity to which the debtor was or became indebted.

Furthermore, I believe that the conduct of the counsel for the debtors is in violation of the ethical and professional standards required of attorneys by the Bankruptcy Code. Specifically, the counsel for the debtors may have violated 11 U.S.C. § 329, which requires a bankruptcy attorney to disclose any connections to the debtor, such as business or personal relationships, to the court and creditors. Additionally, their conduct may have violated the requirements of 11 U.S.C. § 110 and 11 U.S.C. § 521, which require a debtor to file a list of creditors, a schedule of assets and liabilities, and a statement of financial affairs.

In light of these violations, I respectfully request that the court take swift and decisive action against XYZ Company and its representatives who have perpetrated these fraudulent activities. Furthermore, I urge the court to consider taking action against the counsel for the debtors for their unethical and unprofessional conduct.

VOYAGER DIGITAL HOLDINGS INC. et., al., 1 production and distribution of counterfeit coins violate 18 U.S. Code § 485, which criminalizes the production and circulation of fake coins, and the fraudulent activities of XYZ Company violate the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002.

The Securities Exchange Act of 1934, 15 U.S. Code § 78j(b), prohibits any person from using any manipulative or deceptive device or contrivance in connection with the purchase or sale of any security registered under the Act. Similarly, the Sarbanes-Oxley Act of 2002, 18 U.S. Code § 1348, criminalizes any scheme or artifice to defraud in connection with the sale or purchase of any security.

Moreover, the executives and Company's fraudulent activities also violate the Racketeer Influenced and Corrupt Organizations (RICO) Act, 18 U.S. Code § 1961 et seq., which criminalizes any racketeering activity, including fraud, committed through an organization. The use of counterfeit coins to pay for expenses and the provision of false financial insights can be construed as a pattern of racketeering activity that caused significant harm to their creditors.

Given the severity of the violations committed by VOYAGER DIGITAL HOLDINGS INC. et., al., 1 and its representatives, I respectfully request that the court consider charging the debtors with the crimes they committed. Furthermore, I urge the court to order the immediate return of any crypto that was obtained through these fraudulent activities under the applicable federal forfeiture laws.

Thank you for your attention to this matter.

Sincerely,

/s/ Alah Shehadeh

exclusivetrends@icloud.com